



Scenic Pacifica
Incorporated Nov. 22, 1957

CITY OF PACIFICA

170 Santa Maria Avenue • Pacifica, California 94044-2506
www.cityofpacifica.org

MAYOR
Karen Ervin

MAYOR PRO TEM
Sue Digre

COUNCIL
Mary Ann Nihart
Mike O'Neill
John Keener

July 7, 2015

Mr. Bruce Wolfe
Executive Officer
San Francisco Bay Regional Water Quality Control Board
1515 Clay Street, Suite 1400
Oakland, CA 94612

**SUBJECT: COMMENTS REGARDING THE TENTATIVE ORDER FOR THE SAN FRANCISCO BAY
REGION MUNICIPAL REGIONAL STORMWATER PERMIT**

The City of Pacifica (City) appreciates the opportunity to submit the following comments on the Tentative Order for the San Francisco Bay Region Municipal Regional Stormwater Permit, specifically section C.14. City of Pacifica and San Mateo County Fecal Indicator Bacteria Controls. The City is greatly concerned with bacterial loadings in San Pedro Creek and at Pacifica State Beach and recognizes the need to improve water quality.

Our comments are as follows:

- The City, in collaboration with the County of San Mateo, has worked hard to receive, discuss and address comments from the Water Board staff on multiple iterations of the San Pedro Creek and Pacifica State Beach Bacteria TMDL Best Management Practices Implementation Plan and Monitoring (TMDL BMP and Monitoring Plan). C.14 of the MRP should reflect this Plan and provide references to it, rather than outline specific requirements in the permit itself.
- Provision C.14.a.ii.(5) requires that the City inspect and clean-up the ten (10) high priority dog waste locations (required under Provision C.14.a.ii.(4)) on a monthly basis from November 1 through March 31 and prior to forecast rain events with a rainfall of 0.1 inches or more. Consistent with City policy, the required trash receptacles at these locations will already be emptied at least weekly; however, more detailed inspections and clean-ups will require specially trained City staff. Recognizing limited City resources, the frequency of inspections and clean-ups should be reduced to a quarterly basis throughout the year. Given the unpredictable nature of rainfall, it is difficult for the City to ensure that staff will be available for this task prior to storm events. If the Water Board does not modify this requirement, the City requests that the Water Board specify which forecast station to monitor and what time period applies (e.g., daily, hourly). In addition, the rainfall depth should be increased from 0.1 to 0.5 inches. In

Pacifica's coastal location, rainfall events of 0.1 inches are very common. For example, between 1998 and 2014, 0.1 inches of daily rainfall was recorded at Pacifica rain gauges an average of 40 times per year. If inspections and cleanups were required prior to each of these rainfall events, it would represent a very costly undertaking. Furthermore, the value of these inspections and clean-ups is questionable; the presence of waste bag dispensers and trash cans at these stations is intended to eliminate pet waste left on sidewalks.

- Provision C.14.c.ii.(3) requires that the City and County of San Mateo analyze samples for human-, horse-, and dog-specific genetic markers (i.e., microbial source tracking; MST) to characterize bacteria in the watershed. Although the City and County intend to sample for these constituents in Water Year 2016 (WY2016), this approach should not be required in subsequent years of characterization monitoring (e.g., WY2018, WY2020, etc.). Similar MST studies have been conducted in the past in the same watershed; however, Water Board staff has disregarded the results when the TMDL BMP and Monitoring Plan was in development. The City would like an assurance that characterization monitoring results that it and the County conducts will be considered in future evaluations of the watershed.
- Provision C.14.c.ii.(5) requires that any and all changes to the iterative characterization monitoring plan be reviewed and accepted by the Executive Officer. Executive Officer approval should be eliminated. Characterization monitoring, as described in the TMDL BMP and Monitoring Plan and Provision C.14.c.i. is intended to be iterative in nature and allow for flexibility of design and details in years subsequent to WY2016. Executive officer review and acceptance of changes to the plan may be lengthy and/or result in unnecessary additional investigation with unknown cost and schedule implications.
- The City would like acknowledgment in the MRP fact sheet that the ecology of the reference watershed for the TMDL, which is what the wasteload allocations were based on, differs significantly from the ecology of the San Pedro Creek watershed.

Please feel free to contact Raymund Donguines at (650)738-3768 or donguinesr@ci.pacifica.ca.us should you have any questions or require additional information. Thank you for your consideration of these comments.

Sincerely,



Van Dominic J. Ocampo, PE
Director of Public Works / City Engineer



Dave Gromm
Director of Wastewater, Collection & Plant
Operations

Cc: Matthew Fabry, Coordinator - San Mateo Countywide Water Pollution Prevention Program